

"Please file in case"

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
Harrisburg Division

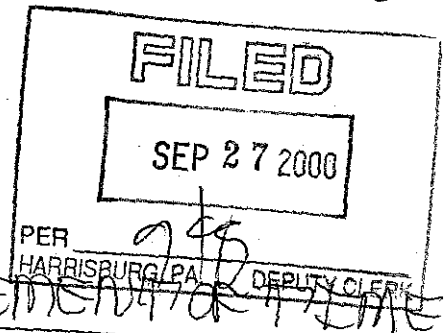
JOHN RICHARD JAE,  
Plaintiff,

vs.

DR. ROBERT CLARK et al.,  
Defendants.

CIVIL No. 1-CK-00-

U.S. District Judge for  
Magistrate Judge Smy



MOTION FOR ENLARGEMENT OF TIME

Comes Now, the Plaintiff & Pro Se Counsel in the above  
Civil Action, John Richard Jae, as a Layman Unlettered  
Arts & Sciences of the Laws & Legal Procedures within the  
States, who, now files his Motion For Enlargement of Time  
pursuant to Fed. R. Civ. P., Rule 6(b), herein, & who, avers & deposes &

1. That, on or about June 5, 2000, Plaintiff John Richard Jae  
commenced this Civil Action, by filing a 42 U.S.C. § 1983 Civil Rights  
Complaint, with an Application For Leave To Proceed In Forma  
In this Federal Court, against Defendant Dr. Robert Clark.

2. On June 21, 2000, this Court granted Plaintiff leave to proceed  
in forma pauperis, herein this case.

3. On August 3, 2000, this Plaintiff filed an Amended Complaint  
a night, pursuant to Fed. R. Civ. P., Rule 15(a), named five additional  
herein this Civil Rights Action.

4. On August 9, 2000, U.S. Magistrate Judge Dr. Andrew Smyke  
Court, ordered the Clerk to serve Plaintiff's amended Complaint  
on the new defendants in accordance with Fed. R. Civ. P. 4  
this case.

5. On or about September 8, 2000, correction Defendants by

Filing of Responsive Pleading To Plaintiff's Amended Complaint with a Brief and Appendix in support herein this case, which Plaintiff received his copies of each of such here on September 13, 2000. Defendant Clark has not answered the Complaint herein, nor joined in the above-referenced Defendants' Motion nor filed his own such same motion nor any other motion herein.

7. Plaintiff avers & submits, that due to the fact(s) that Prison RHU Lieutenant <sup>Proctor</sup> [redacted] deliberately & maliciously refused to allow Plaintiff to receive his Court Case File and Papers in this case from his personal property in the Prison's RHU Room here, in violation of DC-ADM. #801. VI. M.S., of the Department of Corrections, which is mandatory, due to the fact that Prison RHU Lieutenant Rhoades & officers deliberately maliciously refuse to allow this Plaintiff to go to & use Prison's RHU Mini Law Library here, in violation of DC-ADM. #00 B.3-74, & 8, of the Pa. Dept. of Corrections, which is mandatory, & fact(s) that Defendants Drogovich, Norfomey & Fialkovitch, all fully aware & have condoned and <sup>have</sup> failed to correct & the above-stated illegal actions & violations of the RHU Lieutenant Rhoades & officers here, and due to the fact this Plaintiff needs his Court Case File and Papers herein and furthermore needs to go to & use the RHU Mini Law Library at least once beforehand in order to enable him to articulate, prepare, file & serve his Reply Brief in opposition to Defendants' Motion To Revoke Plaintiff's In Forma Pauperis Status & Defer Filing of Responsive Pleading To Plaintiff's Amended Complaint, and because this Plaintiff is getting ready to be transferred to another State Prison within the next several weeks, Plaintiff is unable to prepare, file and serve his Plaintiff's Reply Brief in opposition to Defendants' Motion To Revoke Plaintiff's In Forma Pauperis Status and To Defer Filing of Responsive Pleading, herein this case on or before September 27, 2000, the present due date for such

of time of sixty (60) days from September 27, 2000, to a  
 including November 27, 2000, in which to prepare, file & serve  
 his Plaintiff's Reply Brief in opposition to Defendants' Motion to  
 Revoke Plaintiff's In Forma Pauperis Status And To De  
 Filing of Responsive Pleading, here in this case:

(w) HERETOFRE, Plaintiff John Richard Jae, Prays that the  
 Court will enter an order granting him an enlargement  
 time of sixty (60) days from September 27, 2000, to include  
 November 27, 2000, in which to prepare, file & serve his Plaintiff  
 Brief in opposition to Defendants' Motion to Revoke Plaintiff's  
 Pauperis Status And To Defer Filing of Responsive Pleading to Plaintiff's  
 Amended Complaint here in this Civil Rights Action.

I declare under penalty of perjury & pursuant to 28 U.S.C.  
 §1746, that the above foregoing facts are true & correct.

AND HE SHALL EVER PRAY:  
 RESPECTFULLY SUBMITTED:

(s) John Richard Jae  
 MR. JOHN RICHARD JAE,  
 Plaintiff and Pro Se Counsel

Dated/Executed on:

25th SEPTEMBER 2000:

At: Camp Hill, Pennsylvania:

MR. John Richard Jae,  
 #BQ-3219  
 SCI - Camp Hill  
 P.O. Box 200  
 Camp Hill, PA. 17001-0200

BPM No. 1 = CV-00-1090  
CERTIFICATE OF SERVICE

I CERTIFY that on this 25th day of September, 2000  
I caused a true & correct copy of the within  
Plaintiff's Motion For An Enlargement of Time  
to be served upon the Persons listed below by First  
Class Mail, Postage prepaid & addressed to:

MR. James D. Young, Esquire  
LAVERY, FAHERTY, YOUNG AND FAHERTY, PC  
Attorneys At Law  
P.O. Box 1245  
Harrisburg, PA 17108-1245

MR. Robert M. Wolff  
Assistant Counsel  
Office of the Chief Counsel  
Pa. Dept. of Corrections  
55 Utley Drive  
Camp Hill, PA 17001

Dated/Executed at:

25th September, 2000 =

At: Camp Hill, Pennsylvania =

(S) John Richard J. [Signature]  
MR. JOHN RICHARD J. [Signature]  
Plaintiff and his Counsel